

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

RUMEYSA OZTURK,

Petitioner,

v.

DONALD J. TRUMP, in his official capacity as President of the United States, PATRICIA HYDE, Field Office Director, MICHAEL KROL, HSI New England Special Agent in Charge, TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement, and KRISTI NOEM, Secretary of Homeland Security; and MARCO RUBIO, in his official capacity as Secretary of State

Respondents.

Civil Action No. 1:25-cv-10695-DJC

**RESPONDENTS' MOTION FOR
LEAVE TO EXCEED PAGE LIMITATION**

Now come Respondents, by and through their attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, and hereby respectfully move the Court to allow Respondents to exceed the page length limitation for its forthcoming response in opposition to Petitioner's Amended Petition for Habeas Corpus in excess of the twenty-page limit set by Local Rule 7.1(b)(4). As grounds for this motion, Respondents state that additional pages are necessary to thoroughly address the background and legal issues presented by Petitioner's Amended Petition which include matters concerning proper jurisdiction and venue as well as responses to Petitioner's allegations concerning unlawful arrest and detention. Respondents ask for leave to file no more than 10 pages in excess of the twenty-page limit.

The undersigned has conferred with Petitioner's counsel who does not oppose this request.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

Dated: April 1, 2025

By: /s/ Mark Sauter
Mark Sauter
Assistant United States Attorney
United States Attorney's Office
1 Courthouse Way, Suite 9200
Boston, MA 02210
Tel.: 617-748-3347
Email: mark.sauter@usdoj.gov

LOCAL RULE 7.1 CERTIFICATION

I, Mark Sauter, Assistant United States Attorney, hereby certify that counsel for Petitioner, Rumeysa Ozturk, has been consulted regarding this Motion and has expressed non-opposition to the relief requested in this Motion.

Dated: April 1, 2025

By: /s/ Mark Sauter
Mark Sauter
Assistant United States Attorney

CERTIFICATE OF SERVICE

I, Mark Sauter, Assistant United States Attorney, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: April 1, 2025

By: /s/ Mark Sauter
Mark Sauter
Assistant United States Attorney